

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
AIU INSURANCE COMPANY,

Plaintiff,

-against-

TIG INSURANCE COMPANY,

Case No. 07-CV-7052 (SHS)

Defendant.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Sean Thomas Keely, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Julie Rodriguez Aldort, Esq.
Butler Rubin Saltarelli & Boyd LLP
70 West Madison Street, Suite 1800
Chicago, IL 60602
Phone: (312) 444-9660
Fax: (312) 444-9287

Julie Rodriguez Aldort is a member in good standing of the Bar of the State of Illinois and the State of California. There are no pending disciplinary proceedings against Julie Rodriguez Aldort in any State or Federal Court.

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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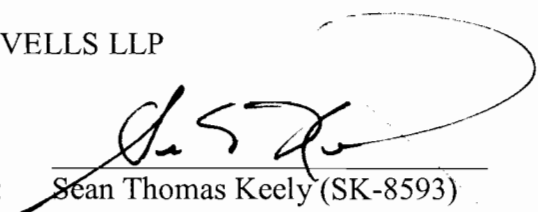
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Dated: New York, New York
September 26, 2007

Respectfully submitted,

LOVELLS LLP

By:  Sean Thomas Keely (SK-8593)

590 Madison Ave.
New York, NY 10022
Phone: (212) 909-0600
Fax: (212) 909-0660

*Attorneys for Defendant
TIG Insurance Company*

TO: William A. Maher, Esq.
Marc L. Abrams, Esq.
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10110
(212) 382-3300

UNITED STATES DISTRICT COURT
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Defendant.

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**AFFIDAVIT OF
SEAN THOMAS KEELY
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)


Sean Thomas Keely, being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel with the firm Lovells LLP, counsel for Defendant TIG Insurance Company in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Julie Rodriguez Aldort as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and this Court.
3. Julie Rodriguez Aldort is associated with the firm Butler Rubin Saltarelli & Boyd LLP, and is a member in good standing of the bars of the Supreme Court of Illinois and the Supreme Court of California. Original certificates of good standing issued by the clerks of the Supreme Court of Illinois and the Supreme Court of California are attached hereto as Exhibit A.

4. I have found Ms. Aldort to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
5. Accordingly, I am pleased to move the admission of Julie Rodriguez Aldort, pro hac vice.
6. I respectfully submit a proposed order granting the admission of Julie Rodriguez Aldort, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the Court grant the motion to admit Julie Rodriguez Aldort, to represent Defendant in the above-captioned matter.

Sworn to before me this
26th day of September, 2007.

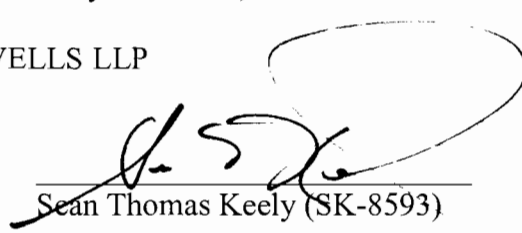


Notary Public

ANDREW M. BEHRMAN
Notary Public, State of New York
Reg. No. 02BE6132944
Qualified in New York County
Commission Expires Aug. 29, 2009

Respectfully submitted,

LOVELLS LLP


By: Sean Thomas Keely (SK-8593)

590 Madison Ave.
New York, NY 10022
Phone: (212) 909-0600
Fax: (212) 909-0660

Attorneys for Defendant
TIG Insurance Company

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Julie Rodriguez Aldort

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Julie Rodriguez Aldort
was duly admitted to practice in said Court on (09/20/2000)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (09/12/2007)

Michael W. Dobbins, Clerk,

By: David A. Jozwiak
Deputy Clerk



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

JULIE CHRISTINE RODRIGUEZ ALDORT

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that JULIE CHRISTINE RODRIGUEZ ALDORT was on the 9th day of July-1999 admitted to practice as an attorney and counselor at law in all the courts of this state; and that her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court,
this 17th day of September, 2007.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By: 

Deputy Clerk

PROOF OF SERVICE

I am over the age of 18 and not a party to the within action; my business address is: 590 Madison Avenue, New York, New York, 10022.

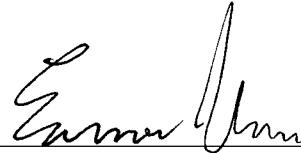
On September 26, I served the **MOTIONS TO ADMIT COUNSEL PRO HAC VICE** with respect to Julie Aldort, Catherine Isely, Amy Pines and James Rubin in this action by placing true copies thereof in sealed envelopes addressed as follows:

William A. Maher, Esq.
Marc L. Abrams, Esq.
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10110
(212) 382-3300

BY EXPRESS DELIVERY (VIA FEDERAL EXPRESS): I caused said envelope(s) to be delivered within three business days via Federal Express in lieu of delivery by mail to the addressee(s).

Executed on September 26, 2007 at New York, New York.

I declare that I am employed in the office of counsel for defendant TIG Insurance Company at whose direction the service was made.

A handwritten signature in black ink, appearing to read "Eamon Mason", is written over a horizontal line.

EAMON MASON